### UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

NETLIST, INC.,	
Plaintiff,  vs.  SAMSUNG ELECTRONICS CO, LTD; SAMSUNG ELECTRONICS AMERICA, INC.; SAMSUNG SEMICONDUCTOR INC.,	Case No. 2:22-cv-293-JRG  JURY TRIAL DEMANDED  (Lead Case)
Defendants.	
NETLIST, INC.,	
Plaintiff,	) )
vs.	Case No. 2:22-cv-294-JRG
MICRON TECHNOLOGY, INC.; MICRON SEMICONDUCTOR PRODUCTS, INC.; MICRON TECHNOLOGY TEXAS LLC,	JURY TRIAL DEMANDED ) )
Defendants.	

# NETLIST, INC.'S UNOPPOSED MOTION TO WITHDRAW MOTION TO COMPEL PRODUCTION OF VALUATION DOCUMENTS (DKT. 219)

Plaintiff Netlist, Inc. ("Netlist") hereby respectfully moves to withdraw its Motion to Compel Production of Valuation Documents against Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. ("Samsung") (Dkt. 219). Samsung has stated that it produced all non-privileged documents responsive to Netlist's request based on a reasonable search. In light of Samsung's representation, Netlist's motion is mooted.

Dated: December 1, 2023 Respectfully submitted,

/s/ Jason G. Sheasby

Samuel F. Baxter Texas State Bar No. 01938000 sbaxter@mckoolsmith.com Jennifer L. Truelove Texas State Bar No. 24012906 jtruelove@mckoolsmith.com

#### MCKOOL SMITH, P.C.

104 East Houston Street Suite 300 Marshall, TX 75670 Telephone: (903) 923-9000 Facsimile: (903) 923-9099

Jason G. Sheasby (pro hac vice) jsheasby@irell.com
Annita Zhong, PhD (pro hac vice) hzhong@irell.com
Thomas C. Werner (pro hac vice) twerner@irell.com
Yanan Zhao (pro hac vice) yzhao@irell.com
Michael W. Tezyan (pro hac vice) mtezyan@irell.com

#### **IRELL & MANELLA LLP**

1800 Avenue of the Stars, Suite 900 Los Angeles, CA 90067 Tel. (310) 277-1010 Fax (310) 203-7199

Philip Warrick New York Bar No. 4471413 pwarrick@irell.com

#### IRELL & MANELLA LLP

750 17th Street NW, Suite 850 Washington, DC 20006 Tel. (310) 777-6512

Attorneys for Plaintiff Netlist, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that, on December 1, 2023, a copy of the foregoing was served to all counsel of record of Micron defendants via the Court's CM/ ECF system.

/s/Yanan Zhao Yanan Zhao